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January 13, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

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JAN 13 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **The Use of N11 Codes and Other Abbreviated Dialing Arrangements**
CC Docket No. 92-105, NSD File No. L-98-139

Dear Ms. Salas:

On behalf of Bell Atlantic, enclosed please find a paper copy and one 3.5 IBM compatible computer diskette in read-only mode containing Bell Atlantic's Comments in the above-referenced matter which are being filed today.

Please call if you have any questions concerning the enclosed materials.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Liz Hepburn", followed by a long horizontal flourish.

Enclosures

cc: ITS

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of

The Use of N11 Codes and Other
Abbreviated Dialing Arrangements

CC Docket No. 92-105
NSD File No. L-98-139

COMMENTS OF BELL ATLANTIC

Bell Atlantic¹ supports the conclusions and recommendations concerning abbreviated dialing arrangements made in the report of the North American Numbering Council submitted to the Commission in September 1998.

Perhaps most important, Bell Atlantic agrees that abbreviated dialing resources should not be utilized for ordinary telephone service, carrier access applications or for speed calling arrangements.² Furthermore, "there appears to be little, if any, demonstrated need for additional nationally administered abbreviated dialing arrangements at this time."³ Therefore, the Commission should not require that any such arrangements be provided.

¹ The Bell Atlantic telephone companies are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company and New England Telephone and Telegraph Company.

² Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements ("Report") § 5.2.

³ Report § 12.0.

In its minority views, Low Tech asks that the Commission require that *XXXX/11XXXX dialing formats be made available and that those arrangements be provided within 12 months. However, Low Tech has not committed to buying these services if they are available, nor has it provided any indication that anyone else will or in any other way refuted the Report's conclusion that there is little, if any, demand for these arrangements. Without some proof of demand, carriers should not be required to provide these capabilities.

If the Commission concludes that there is some need for additional abbreviated dialing arrangements — which it should not — they should be developed subject to these constraints:

Non-digit characters such as "*" and "#" should be used as part of an abbreviated dialing format only as delimiters, and not as part of the address. Accordingly, any new abbreviated dialing arrangement may include non-digit characters at the beginning or end of the format (or both) but not between digits.

While both arrangements are technically feasible, the use of the leading "#" is distinctly preferable because of the timing conflicts caused by the trailing "#".

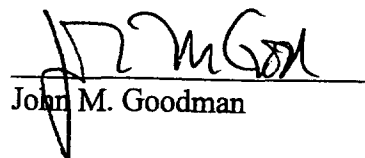
"*" is currently reserved and administered by the NANPA on a national basis to be used only for feature activation and deactivation. Using "*" for abbreviated dialing would cause end user confusion and should not be permitted.

Any format selected for multi-network applications should provide a sufficient quantity of resources to serve a relatively large number of service providers. For example, a format of four or five digits appears reasonable, as it would support 10,000 or 100,000 assignments.

The NANC estimated that it would take approximately 12 months to produce stable requirements after the industry decides on a specific arrangement, and another 12 months for vendor development of the capability after the requirements are provided and firm orders have been received. The NANC also noted that these initial estimates could be changed by the specifics of the application for which the dialing arrangement might be used, and whether or not

changes to signaling standards are required. If the Commission were to require additional arrangements — which, once again, it should not — it must take this timing into account.

Respectfully submitted,



John M. Goodman

Attorney for the Bell Atlantic
telephone companies

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Michael E. Glover
Of Counsel

Dated: January 13, 1999

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1 Diskette